

EXHIBIT A

From: [Susheel Kirpalani](#)
To: [Bridge, Charles](#)
Cc: [Mario Gazzola](#); [Andrew J. Rossman](#); [Anker, Phil](#); [Firszenbaum, Ross](#)
Subject: Re: Abrams v. Trive Capital (Bankr. D. Del.)
Date: Friday, October 11, 2024 11:45:25 AM

EXTERNAL SENDER

Hello Charlie,

Missing from your message is your reciprocal undertaking to investigate and make a representation that all non-privileged documents have been faithfully produced by Trive, and that a log is being prepared for our review, so we can raise any disputes promptly with the judge. It would seem that would be part of your contribution towards the “*if you want to move this case along*” line.

Assuming it was an oversight to omit that, and we can confirm there will be a mutual date for exchanging documents/logs, we are happy to assemble and produce the below information. What we would not be happy to do is have a one way street. I am sure you can appreciate that. Obviously our requests to Trive have been outstanding many months longer than your below request.

It is on us to provide an update/details of our prior meet and confers with your predecessor counsel, and why we believe numerous documents have been withheld. Mario or someone else from my team will do that promptly and then we should speak again.

Can you ask your local counsel to prepare a stipulation for that Friday in November.

Have a good weekend.

Thank you.

Susheel

On Oct 11, 2024, at 10:46 AM, Bridge, Charles
<Charles.Bridge@wilmerhale.com> wrote:

[EXTERNAL EMAIL from charles.bridge@wilmerhale.com]

Dear Susheel and Mario,

Thank you for taking the time to speak yesterday.

On behalf of the Trive Defendants, we respectfully request that the Trustee produce:

1. Copies of all productions made to the Trustee in response to the Trustee’s Rule

2004 discovery requests, as well as all other documents you obtained in any investigation conducted, including without limitation all documents you obtained from the Noteholders or any Lucky Bucks entity; and

2. Copies of all documents upon which the Trustee relied in drafting the complaint, including without limitation all documents quoted in or incorporated by reference into the complaint. (This request does not encompass documents produced by Trive to the Trustee, nor documents already captured by Request No. 1.)

We expect that the Trustee already has these sets of documents at hand, and that the Trustee's burden of production thus would be *de minimis*. We obviously can, and if necessary will at the appropriate time, serve formal document requests requesting these documents and others. But if you want to move this case along, you should be prepared to produce these basic documents now without waiting for formal discovery. If you have a different view, please let us know.

Sincerely,
Charlie Bridge

Charles C. Bridge | WilmerHale

(he/him/his)

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